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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ILDA KALANI,)	Case No.: 4:13-cv-04591-KAW
)	
Plaintiff,)	EX PARTE MOTION FOR AN
)	EXTENSION OF TIME TO RESPOND TO
vs.)	PLAINTIFF'S MOTION FOR SUMMARY
CAROLYN W. COLVIN,)	JUDGMENT
Acting Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY REQUESTED by the Defendant through her undersigned attorney, subject to the approval of the Court, that the Commissioner have a 7-day extension of time up to and including Friday, May 9, 2014, in which to respond to Plaintiff's Motion for Summary Judgment. This is Defendant's second request for an extension of time to respond to Plaintiff's motion. Defense counsel needs the additional time to prepare a response in this matter due to a heavy workload, despite due diligence. Defendant seeks an extension by motion rather than by stipulation because Defendant was unable to timely reach Plaintiff's counsel to obtain his authorization for a stipulation.

1 Defense counsel apologizes to the Court and to Plaintiff's counsel for any inconvenience
2 caused by this delay.

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4 Respectfully submitted,

5 Dated: May 2, 2014

MELINDA L. HAAG
United States Attorney
DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
Social Security Administration

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9 By: /s/ Lynn M. Harada
LYNN M. HARADA
Special Assistant U.S. Attorney

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11 Attorneys for Defendant

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13 ORDER:

14 APPROVED AND SO ORDERED:

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16 Dated: May 6, 2014

17 Kandis Westmore
THE HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge